UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY NEWARK DIVISION

DANIEL D'AMBLY,

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON; ST. LAWRENCE UNIVERSITY; TRIBUNE PUBLISHING COMPANY; NEW YORK DAILY NEWS; VIJAYA GADDE; TWITTER, INC.; COHEN, WEISS AND SIMON, LLP,

Defendant.

Civil Action No. 2:20-cv-12880-JMV-JAD

CERTIFICATION OF JOSEPH MULHERIN, ESQ. IN SUPPORT OF APPLICATION FOR PRO HAC VICE ADMISSION

- I, Joseph K. Mulherin, Esq., hereby certify as follows:
- 1. I am a partner with the law firm of McDermott Will & Emery LLP, counsel to Defendants Tribune Publishing Company and New York Daily News ("Defendants") in the above-captioned matter currently pending in the United States District Court for the District of New Jersey. I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this Certification in support of Defendants' application for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c).
- 2. I have never been suspended from the practice of law in any jurisdiction, nor have I been disciplined or censured by any disciplinary authority of any bar in which I have been admitted to practice.

- 3. No disciplinary proceedings are pending against me in any jurisdiction. I understand my continuing obligation to advise the Court of any disciplinary proceedings that may be instituted against me.
- 4. I am ineligible for plenary admission to the bar of this Court under Local Civil Rule 101.1(b).
- 5. The issues raised in this litigation involve areas with which I have experience in the law.
- 6. Pursuant to the rules of this Court, all pleadings submitted on behalf of defendants in this litigation will be signed by Richard I. Scharlat, Esq.
- 7. I am duly admitted and currently in good standing to practice law in the following jurisdictions, for which I list my year of admission and the address of the official or office maintaining the roll of such members of its bar:

Court/Jurisdiction	Year of	Court Office and Address
	Admission	
U.S. Court of Appeals for the	February 28,	Robert Spears, Clerk of Court, Peoria County
Tenth Circuit	2020	Courthouse 324 Main Street Peoria, IL 61602
U.S. District Court for the	August 19,	Clerk's Office 305 U.S. Courthouse 100 N.E. Monroe
Central District of Illinois	2005	Street Peoria, IL 61602
Illinois Supreme Court	November 7,	Clerk of the Supreme Court Supreme Court Building
	2002	200 East Capitol Springfield, IL 62701
U.S. District Court for the	December 10,	Thomas G. Bruton, Clerk of Court U.S. District Court
Northern District of Illinois	2002	for the Northern District of Illinois, Eastern Division
		Everett McKinley Dirksen United States Courthouse
		219 South Dearborn Street Chicago, IL 60605
U.S. District Court for the	December 12,	Gina M. Colletti, Clerk of Court, U.S. District Court
Eastern District of Wisconsin	2004	for the Eastern, District of Wisconsin, United States
		Federal Building and Courthouse 517 E. Wisconsin
		Ave. Rm. 362 Milwaukee, WI 53202

8. I am willing to submit to the jurisdiction of this Court and to comply with all its rules and procedures. To ensure my familiarity with these regulations, I have reviewed the local rules of this Court.

9. I agree to abide by Local Civil Rule 101.1(c).

10. I agree to strictly observe the dates fixed for scheduling conferences, motions,

briefs, pre-trial conferences, trial or other proceedings. I further agree to submit to the

jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the

Court may deem proper.

11. Pursuant to Local Civil Rule 101.1(c), I agree to pay the required fee to the Clerk

of the United States District Court for the District of New Jersey.

12. I further agree, pursuant to Local Rule 101.1(c)(2), to make a payment to the New

Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

13. For the foregoing reasons, I respectfully request that I be admitted *pro hac vice* to

practice before this Court for the purpose of representing Defendants in the matter.

I certify under penalty of perjury that the foregoing is true and correct.

Executed: January 20, 2021.

Joseph K. Mulherin, Esq.

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